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U.S. Department of Transportation
Docket Management Facility
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590

Re: Petition for Exemption from 14 CFR §121.135(a)(3)

Ladies/Gentlemen:

In accordance with the provisions of Title 14, Code of Federal Regulations (14 CFR) §11.25, Southwest Airlines petitions for an Exemption from 14 CFR §121.135(a)(3) to allow Southwest Airlines to use alternate procedures for electronic manual revision control.

Section of the CFR Affected

14 CFR §121.135(a)(3) requires: "Each manual required by §121.133 must – have the date of the last revision on each page concerned"

Background

8900.1 Volume 3 Chapter 32 Section 2 Approval and Acceptance of Manuals and Checklists Paragraph 3-3156 A (1) Notification of Approval states: "For a document, manual, or checklist that contains page control sheets, the POI shall annotate both copies of the page control sheets with the phrase "FAA-Approved." Under the words "FAA-Approved, POIs shall enter the effective date of approval and sign both copies." Revision Control and FAA Approval is therefore annotated with a signature and date on the list of effective pages.

This process has worked well for manuals published and viewed on paper. However, manuals are now being published and viewed on electronic devices that display the manual content in a continuous flow format as opposed to page-by-page.

Advisory Circular 120-78A Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals, Chapter 4, 4-2 (i) (2) Revision status of each manual page states: "Each page of a manual should contain the date of the latest revision for that particular page. For part 121 operations, this is required by §121.135(a)(3). If an electronic manual is distributed via a device that displays the manual in a continuous flow format, as opposed to page-by-page, then each section or block of information displayed on the device will contain the date of the latest revision."

Therefore, displaying the date of the latest revision of the electronic manual content serves as the revision control for electronic manuals with a continuous flow format, effectively eliminating the need for a list of effective pages and satisfies the requirements of §121.135(a)(3).

The Applicable Regulations and Relief Sought

Southwest Airlines is seeking to use the date of the latest revision of each section or block of information of electronic manual content displayed in a continuous flow format, as the revision control in lieu of a page control sheet commonly referred to as a list of effective pages, as required by 14 CFR §121.135(a)(3).

Granting this Exemption Would be in the Public Interest and Would Not Adversely Affect Safety

Safety will not be adversely affected if the FAA grants this petition. Manual revision control and approval processes previously used will remain intact except for the elimination of a page control sheet. The public interest will be served in that the provisions of the Government Paperwork Elimination Act (GPEA), Public Law 105-277, 44 U.S.C. 3504, which became law on October 21, 1998, permits the acceptance of electronic records and requires federal agencies to provide for the option of electronic maintenance, submission, or disclosure of information, when practicable as a substitute for paper.

Conclusion

For the foregoing reasons, we respectfully request an Exemption from 14 CFR §121.135(a)(3) to use the date of the latest section or block of electronic content as a revision control, in lieu of a List of Effective pages.

Please contact the undersigned or Jim Stieve at 469-603-4259 or jim.stieve@wnco.com, if you have any questions or need additional information.

Respectfully submitted,



Jeff Hamlett

JH/jgs

cc: Alan Kasher, Executive Vice President Daily Operations
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